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*Attorneys for Plaintiffs and Putative Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

LD, DB, BW, RH AND CJ on behalf of themselves and all others similarly situated,

## Plaintiffs,

VS.

UNITEDHEALTHCARE INSURANCE COMPANY, a Connecticut Corporation,  
UNITED BEHAVIORAL HEALTH, a California Corporation, and  
MULTIPLAN, INC., a New York Corporation

## Defendants.

Case No.: 4:20-cv-02254-YGR

**DECLARATION OF AARON MODIANO  
IN SUPPORT OF PLAINTIFF'S NOTICE  
OF MOTION, MOTION, AND  
MEMORANDUM OF POINTS AND  
AUTHORITIES IN SUPPORT OF  
MOTION FOR CLASS CERTIFICATION**

1 I, Aaron Modiano, an attorney, declare under penalty of perjury, that the following is true  
2 and correct, based on my personal knowledge:

3 1. I am an attorney at law duly licensed to practice before all courts in the State of  
4 Florida and admitted *pro hac vice* in this matter. I am of counsel at Arnall Golden Gregory LLP,  
5 a counsel of record for Plaintiffs in the instant action.

6 2. Attached hereto and marked as Exhibit A is a true and correct copy of MPI-  
7 009021;

8 3. Attached hereto and marked as Exhibit B is a true and correct copy of MPI-  
9 000615;

10 4. Attached hereto and marked as Exhibit C is a true and correct copy of Deposition  
11 excerpts of the deposition of Denise Strait;

12 5. Attached hereto and marked as Exhibit D is a true and correct copy of summary  
13 experts from transcripts of verification of benefit calls produced by United;

14 6. Attached hereto and marked as Exhibit E is a true and correct copy of  
15 UHC000197899;

16 7. Attached hereto and marked as Exhibit F is a true and correct copy of excerpts of  
17 United 30(b)(6) Deposition of Rebecca Paradise;

18 8. Attached hereto and marked as Exhibit G are true and correct copies of summary  
19 excerpts from IBAAG screenshots produced by United;

20 9. Attached hereto and marked as Exhibit H is a true and correct copy of  
21 UHC000131784

22 10. Attached hereto and marked as Exhibit I is a true and correct copy of Deposition  
23 excerpts of the deposition of Creyna Franco;

11. Attached hereto and marked as Exhibit J is a true and correct copy of Deposition excerpts of the deposition of Radames Lopez;

12. Attached hereto and marked as Exhibit K is a true and correct copy of Deposition excerpts of the deposition of Jolene Bradley;

13. Attached hereto and marked as Exhibit L are true and correct copies of summary excerpts from summary plan descriptions produced by United;

14. Attached hereto and marked as Exhibit M is a true and correct copy of Deposition excerpts of the deposition of Sean Crandell;

15. Attached hereto and marked as Exhibit N is a true and correct copy of  
UHC00007268;

16. Attached hereto and marked as Exhibit 0 is a true and correct copy of  
UHC00091544:

17. Attached hereto and marked as Exhibit P are true and correct composite explanations of benefits produced by United;

18. Attached hereto and marked as Exhibit Q are true and correct composite provider remittance advices produced by United;

19. Attached hereto and marked as Exhibit R are true and correct composite explanations of methodology produced by United and MultiPlan;

20. Attached hereto and marked as Exhibit S is a true and correct copy of Deposition excerpts of the deposition of Jacqueline Kienzle:

21. Attached hereto and marked as Exhibit T is a true and correct copy of

22. Attached hereto and marked as Exhibit U is a true and correct copy of  
UHC00091861:

23. Attached hereto and marked as Exhibit V is a true and correct copy of MPI-0  
12799;

24. Attached hereto and marked as Exhibit W is a true and correct copy of the expert report of Robert Ohsfeldt;

25. Attached hereto and marked as Exhibit X is a true and correct copy of the expert report of Mark Hall;

26. Attached hereto and marked as Exhibit Y is a true and correct copy of  
UHC000178695;

27. Attached hereto and marked as Exhibit Z is a true and correct copy of the expert report of Alexandra Lahav;

28. Attached hereto and marked as Exhibit AA is a true and correct copy of the plaintiff counsels qualifications

29. Attached hereto and marked as Exhibit AB is a true and correct copy of  
UHC000008889;

I declare under the penalty of perjury under the laws of the District of Columbia that the foregoing is true and correct, and I signed this declaration on August 17, 2022 in Washington, D.C.

*/s/ Aaron R. Modiano*

Aaron R. Modiano, Esq.